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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUSSELL LEBARRON, an individual;

Plaintiff,

vs.

INTERSTATE GROUP, LLC; DOES I
through X; and ROE Corporations XI
through XX, inclusive,

Defendant.

Case No: 2:19-cv-01739-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COUNTERCLAIM (ECF NO. 9)**

(SECOND REQUEST)

**STIPULATION AND ORDER TO EXTEND TIME
TO RESPOND TO COUNTERCLAIM (ECF NO. 9)**

IT IS HEREBY STIPULATED AND AGREED between counsel for
Plaintiff/Counter-Defendant Russell LeBarron ("Plaintiff") and Defendant/Counterclaimant
Interstate Group, LLC ("Defendant") as follows:

WHEREAS, on or about August 9, 2019, Plaintiff filed in the Eighth Judicial
District Court a Complaint (the "Complaint"), which was assigned Case No. A-19-
799959-C (the "Lawsuit");

WHEREAS, on or about September 10, 2019, Plaintiff served the
Defendant with the Complaint;

WHEREAS, Defendant filed a Notice of Removal with the United States
District Court, District of Nevada (ECF No. 1);

WHEREAS, Defendant filed its Answer and Counterclaim (the
"Counterclaim", ECF No. 9) on or about October 14, 2019;

1 **WHEREAS**, Parties stipulated to an extension of time to respond to
2 Defendant's counterclaim (ECF No. 11).

3 **WHEREAS**, an Order was granted on October 30, 2019 (ECF No. 12)
4 scheduling Plaintiff's responsive pleading to be filed on or before November 15, 2019.

5 **WHEREAS**, in an effort to conserve costs and time, the Parties plan on
6 engaging in early settlement negotiations and have an Early Neutral Evaluation
7 scheduled for December 4, 2019 (ECF No. 7).

8 **WHEREAS**, the Parties agree to an additional twenty-six (26) day
9 extension through December 11, 2019, for Plaintiff to respond to the Counterclaim in the
10 event this matter does not resolve at the ENE; and,
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1 **WHEREAS**, this is the second request for an extension regarding the filing
2 of Plaintiff's response to Defendant's Counterclaim, which is made in good faith, not for
3 purposes of delay, to conserve costs and fees that are better put towards settlement at
4 the ENE, and neither party is prejudiced by this extension.
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6 Dated this __12th__ day of November 2019.
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8 Dated: November __12__, 2019

Dated: November _12_, 2019

9 Respectfully submitted,

Respectfully submitted,

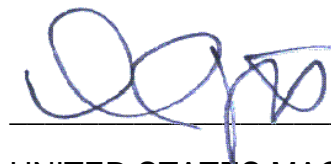
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11 By /s/ Christian Gabroy, Esq.
12 Christian Gabroy, Esq.
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19 *Attorneys for Plaintiff*

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Attorneys for Defendant

20 IT IS SO ORDERED.

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22 UNITED STATES MAGISTRATE JUDGE

23 Dated: November 14, 2019
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